

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**TROUT POINT LODGE, LIMITED, A Nova Scotia
Limited Company; VAUGHN PERRET and
CHARLES LEARY**

PLAINTIFFS

VERSUS

CIVIL ACTION NO: 1:12CV00090 LG-JMR

DOUG K. HANDSHOE

DEFENDANT

**MOTION FOR SUMMARY JUDGMENT OF PLAINTIFFS
TROUT POINT LODGE, LTD., A NOVA SCOTIA LIMITED COMPANY;
VAUGHN PERRET; AND CHARLES LEARY**

COME NOW Plaintiffs, Trout Point Lodge, Limited, a Nova Scotia Limited Company; Vaughn Perret; and Charles Leary, and file this their Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56, and in support would show there exists no genuine issue of material fact precluding judgment in favor of Plaintiffs. The Judgment entered in the Supreme Court of Nova Scotia, Canada on February 2, 2012, as in enrolled by Plaintiffs in the Circuit Court of Hancock County, Mississippi is enforceable, and Plaintiffs as a matter of law should be able to execute upon it. In support of this Motion, Plaintiffs submit copies of the following documents:

1. Affidavit of Service filed October 11, 2011; Affidavit of Service filed December 1, 2011; 1st Amended Notice of Action filed September 1, 2011; and 1st Amended Statement of Claim filed September 1, 2011.
2. Order establishing assessment of damages against Defendant.

3. Order for Judgment against Douglas K. Handshoe entered December 12, 2011.
4. Plaintiffs' Motion to Enroll Foreign Judgment.
5. Decision in the Supreme Court of Nova Scotia, the Honorable Justice Suzanne Hood, presiding, dated February 1, 2012 in the case of *Trout Point Lodge, Ltd., Vaughn Perret and Charles Leary as Plaintiffs against Doug K. Handshoe and Jane Doe as Defendants* in Cause No: YAR No. 353654.
6. Hearing Book Exhibits for Damages Assessment Hearing *Book 1 of 1*; and Hearing Book Exhibits for Damages Assessment Hearing *Book 2 of 2*.
7. Affidavit of Charles L. Leary.

Accordingly, Summary Judgment should be entered in favor of Plaintiffs.

Respectfully submitted, this the 20th day of June, 2012.

Trout Point Lodge, Limited, Vaughn Perret and
Charles Leary, Judgment Creditors

By: s/ Henry Laird
Henry Laird, Mississippi Bar No. 1774

CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have sent a true and correct copy of the foregoing Motion for Summary Judgment by using the ECF system to the following:

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This the 20th day of June, 2012.

s/ Henry Laird
Henry Laird

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